UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE	
ULTIMA SERVICES CORPORATION,	x :
Plaintiff,	:
-against-	:
U.S. DEPARTMENT OF AGRICULTURE, U.S. SMALL BUSINESS ADMINISTRATION, SECRETARY OF AGRICULTURE, and ADMINISTRATOR OF THE SMALL BUSINESS ADMINISTRATION, Defendants.	: No.2:20-cv-00041 : DCLC-CRW :
	X

## PLAINTIFF'S MOTION TO EXCLUDE TESTIMOMY OF DEFENDANTS' EXPERT DANIEL CHOW

Plaintiff Ultima Services Corporation ("Ultima") hereby moves, pursuant to Fed. R. Civ. P. 26(a)(2)(B)(ii) and Fed. R. Evid. 702 to exclude testimony of Defendants' proffered expert, Mr. Daniel Chow.

In support of this motion, Ultima relies upon the accompanying memorandum of law and the statements of Michael Rosman and Dr. Jonathan Guryan.

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Respectfully submitted,

/s/ Michael E. Rosman Michael E. Rosman Michelle A. Scott CENTER FOR INDIVIDUAL RIGHTS 1100 Connecticut Ave, NW, Ste. 625 Washington, D.C. 20036 (202) 833-8400

M. Dale Conder, Jr. RAINEY KIZER REVIERE & BELL PLC 209 E. Main St. Jackson, TN 38301

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